

Monte J. White and Associates, P.C.
Monte J. white
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Wichita Falls, TX 76301
(940) 723-0099
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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

IN RE:	§	CHAPTER 13
Zawicki, Michael George	§	CASE NO. 12-10772-NLJ-13
AND	§	
Zawicki, Evelyn Laverne	§	
DEBTORS	§	
	§	

MOTION TO MODIFY CHAPTER 13 PLAN
AFTER CONFIRMATION UNDER 11 USC §1329

The Debtors, by their attorney, state and represent as follows:

1. Debtors' Chapter 13 plan was confirmed on 6/21/2012.
3. Debtors have filed amended Schedule J with the Court.
4. That Debtors' confirmed plan required plan payments of \$2,204.00 for 60 months for a total plan base of \$132,063.00.
5. That Debtors seek a modification under 1329(a) to decrease their plan payments to \$1,300.00 beginning October 2013 according to their current disposable income. Debtors' Chapter 13 plan base will decrease accordingly.
6. Debtors wish to trade in the 2012 Ford Mustang, for which they will receive \$22,500.00. Currently, the balance pay-off is \$4,650.00.
7. Debtors wish to purchase a 2009 Mercury Grand Marquis for \$14,679.00.
8. The Chapter 13 Trustee will cease making payments to Red River Federal Credit Union.
9. Debtors' plan payments are current through September 2013.
10. Debtors feel this modification is necessary due to their advanced age and their need to transport medical equipment when traveling to doctor appointments.
11. Debtors' attorney shall be allowed an additional fee for this Modification in the total amount of \$400.00 which will be paid through the Plan by the Trustee.

WHEREFORE, the Debtors move this honorable court to enter an order modifying Debtors' confirmed Chapter 13 Plan, and to other and further relief to which they may be entitled.

Respectfully submitted,

/s/Monte J. White
Attorney for Debtors

CERTIFICATE OF MAILING

A true and exact copy of the foregoing was served electronically by the ECF System or by First Class Mail on 9/24/2013, on all parties on the mailing matrix:

/s/Monte J. White
Attorney for Debtors

Label Matrix for local noticing
1087-5
Case 12-10772
Western District of Oklahoma
Oklahoma City
Tue Sep 24 14:01:02 CDT 2013

Oak Harbor Capital VI, LLC
c/o Weinstein & Riley, P.S.
2001 Western Ave., Ste. 400
Seattle, WA 98121-3132

AAFES/MIL STAR/EXCHANGE
c/o Creditors Bankruptcy Service
P.O. Box 740933
Dallas, TX 75374-0933

CAPITAL ONE, N.A.
by PRA Receivables Management, LLC
PO Box 12907
Norfolk VA 23541-0907

Discover Bank, DB Servicing Corporation.
PO Box 3025
New Albany, OH 43054-3025

Gmac Mortgage
3451 Hammond Ave
Waterloo, IA 50702-5300

Internal Revenue Service
Special Procedures-Insolvency
PO Box 7346
Philadelphia, PA 19101-7346

Ocwen Loan Servicing LLC
Attn Bankruptcy Department
1100 Virginia Drive
Fort Washington PA 19034-3204

(p) PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067

Red River Federal Cr U
2721 N. Main St
Altus, OK 73521-1617

GE Capital Retail Bank
c/o Recovery Management Systems Corporat
25 SE 2nd Avenue, Suite 1120
Miami, FL 33131-1605

PRA Receivables Management, LLC
POB 41067
NORFOLK, VA 23541-1067

BACK BOWL I LLC, SERIES C
C O WEINSTEIN AND RILEY, PS
2001 WESTERN AVENUE, STE 400
SEATTLE, WA 98121-3132

Chase
Po Box 15298
Wilmington, DE 19850-5298

Discover Fin
Attention: Bankruptcy Department
PO Box 3025
New Albany, OH 43054-3025

Hsbc Bank
HSBC Card Services / Attn: Bankruptcy De
PO Box 5213
Carol Stream, IL 60197-5213

Military Star/AAFES
AAFES
PO Box 650060
Dallas, TX 75265-0060

(p) OKLAHOMA TAX COMMISSION
120 N ROBINSON
STE 2000W
OKLAHOMA CITY OK 73102-7801

Quantum3 Group LLC as agent for
World Financial Network Bank
PO Box 788
Kirkland, WA 98083-0788

Red River Federal Credit Union
PO Box 638
Altus, OK 73522-0638

OCWEN LOAN SERVICING, LLC
Baer, Timberlake, Coulson, Cates P.C.
c/o Robert Hauge
6846 S. Canton Ave, Suite 100
Tulsa, OK 74136-3413

USBC Western District of Oklahoma
215 Dean A. McGee
Oklahoma City, OK 73102-3426

(p) BANK OF AMERICA
PO BOX 982238
EL PASO TX 79998-2238

(p) CITIBANK
PO BOX 790034
ST LOUIS MO 63179-0034

GMAC Mortgage, LLC
Attn: Bankruptcy Department
1100 Virginia Ave
FT. Washington, PA 19034-3204

Internal Revenue Service
55 N. Robinson Stop 5024
Oklahoma City, OK 73102-9229

Monte J. White & Associates
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Wichita Falls TX 76301-5009

PRA Receivables Management LLC
Portfolio Recovery Associates LLC
PO Box 41067
Norfolk VA 23541-1067

Recovery Management Systems Corporation
25 S.E. 2nd Avenue, Suite 1120
Miami, FL 33131-1605

Sears/cbna
Po Box 6282
Sioux Falls, SD 57117-6282

State Farm Bank
c o Becket and Lee LLP
POB 3001
Malvern, PA 19355-0701

State Farm Financial S
PO Box 2328
Bloomington, IL 61702-2328

U.S. Trustee
United States Trustee
215 Dean A. McGee Ave., 4th Floor
Oklahoma City, OK 73102-3444

Wfnnb/woman
Attention: Bankruptcy
PO Box 182686
Columbus, OH 43218-2686

Evelyn Laverne Zawicki
3617 Trail Dr West
Altus, OK 73521-1042

John T. Hardeman
PO Box 1948
Oklahoma City, OK 73101-1948

Michael George Zawicki
3617 Trail Dr West
Altus, OK 73521-1042

Monte J. White
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Wichita Falls, TX 76301-5009

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Bank Of America
Po Box 982238
El Paso, TX 79998

Citibank Sd, Na
Attn: Centralized Bankruptcy
PO Box 20507
Kansas City, MO 64195

(d)FIA CARD SERVICES, N.A.
PO Box 15102
Wilmington, DE 19886-5102

Oklahoma Tax Commission
PO Box 53248
Oklahoma City, OK 73152-3248

Portfolio Recovery Associates, LLC
POB 41067
Norfolk VA 23541

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Oak Harbor Capital VI, LLC
c/o Weinstein & Riley, P.S.
2001 Western Ave., Ste. 400
Seattle, WA 98121-3132

End of Label Matrix	
Mailable recipients	37
Bypassed recipients	1
Total	38